

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	No. 1:18-CR-3495-001 JCH
)	
vs.)	
)	
DOUGLAS D. SMITH,)	
)	
Defendant.)	

DEFENDANT'S AMENDED EXHIBIT LIST

Mr. Douglas Smith, by and through undersigned counsel, Assistant Federal Public Defender Aric G. Elsenheimer, respectfully submits the following list of anticipated Exhibits which may be submitted at trial and requests permission to amend such list to include additional exhibits as may become necessary prior to and during trial:

Exhibits A1-A9: Photographs taken of the Western Winds Motel and the scene shortly after and during law enforcement's arrival.

A1—Photograph of trailer; Government Bates # 88

A2—Photograph of trailer and driveway; Government Bates # 86

A3—Photograph of driveway and house; Government Bates #87

A4—Photograph of path between Mr. Smith's trailer and courtyard;
Government Bates #88

A5—Photograph of door of Mr. Smith's trailer; Government Bates
#90

A6-A30—Images captured from lapel video

Exhibit B--Google earth image of location of Western Winds Motel,
image taken June 10, 2017.

Exhibits C1-C11: Photographs of Mr. Smith's property taken shortly
after May 5.

C1—Photograph of Mr. Smith's courtyard taken from the southwest
corner, photo taken summer of 2018.

C2—Photograph of Mr. Smith's property, including trailer,
courtyard, and house, taken from the south, photo taken summer of 2018.

C3—Photograph of Mr. Smith's property, driveway, house, and
courtyard, taken from the south toward the northeast, photo taken summer

of 2018.

C4—Photograph of Mr. Smith’s property, driveway and house, photo taken summer of 2018.

C5—Photograph of Mr. Smith’s property, driveway and house, with view of Riverside drive, photo taken summer of 2018.

C6—Photograph of Mr. Smith’s property, driveway looking west, trailer, and courtyard.

C7—Photograph, looking north, of Mr. Smiths’ courtyard.

C8—Photograph, looking north, of Mr. Smith’s courtyard.

C9—Photograph, outside of courtyard looking into yard.

C10—Photograph of Mr. Smith’s property, looking north.

C11—Inside Mr. Smith’s property, photo taken summer of 2018.

Exhibit D1-D5—Photographs of markings on tree at southwest corner of Mr. Smith’s courtyard.

Exhibit E – OMI Toxicology Report.

Any exhibit listed in the Government’s exhibit list filed on September 14, 2020 (Doc. 120).

Respectfully Submitted,

FEDERAL PUBLIC DEFENDER

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/s/ Aric G. Elsenhimer

Assistant Federal Public Defender